

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Luminara Worldwide, LLC,

Plaintiff,

v.

Liown Electronics Co. Ltd., Shenzhen
Liown Electronics Co. Ltd., Liown
Technologies/Beauty Electronics, LLC,
Boston Warehouse Trading Corp., Abbott
of England (1981), Ltd., BJ's Wholesale
Club, Inc., Von Maur, Inc., Zulily, Inc.,
Smart Candle, LLC, Tuesday Morning
Corp., Ambient Lighting, Inc., The Light
Garden, Inc., and Central Garden & Pet
Co.,

Defendants.

Shenzhen Liown Electronics Co. Ltd. and
Central Garden & Pet Co.,

Counterclaim Plaintiffs,

v.

Luminara Worldwide, LLC, QVC, Inc.,
Darice, Inc., Bed Bath & Beyond, Inc.,
Williams-Sonoma Stores, Inc., PC
Treasures, Inc., and Brookstone Stores,
Inc.,

Counterclaim Defendants.

NO. 14-cv-03103 (SRN/FLN)

**DECLARATION OF JOSEPH P. REID
IN SUPPORT OF DEFENDANTS'
MOTION TO STRIKE THE EXPERT
OPINIONS OF DOUG PATTON DUE
TO CLAIMS OF PRIVILEGE**

I, Joseph P. Reid, hereby declare as follows:

1. I am an attorney at the law firm of Perkins Coie LLP, counsel for Defendants and Counterclaim Plaintiffs in the above-referenced action. This declaration is submitted in support of Defendants' Memorandum of Law Regarding Motion to Strike the Expert Opinions of Doug Patton Due to Claims of Privilege, and is made of my own personal knowledge.

2. Attached as Exhibit A is a true and correct copy of excerpts from the Deposition Transcript of Doug Patton, taken on October 29, 2015. FILED UNDER SEAL.

3. Attached as Exhibit B is a true and correct copy of the webpage located at <http://www.pattondesign.com/bio.htm>, retrieved on March 31, 2016.

4. Attached as Exhibit C is a true and correct copy of Luminara's Rule 26(a)(1)(A) Initial Disclosures, served on December 31, 2014.

5. Attached as Exhibit D is a true and correct copy of Defendants' Subpoena to Doug Patton to Produce Documents, Information, and Objects or to Permit Inspection of Premises, served January 23, 2015.

6. Attached as Exhibit E is a true and correct copy of Doug Patton's Objections to Defendants' document subpoena, served on February 6, 2015.

7. Attached as Exhibit F is a true and correct copy of Luminara's Rule 26(a)(2)(C) Disclosures, served on February 1, 2015.

8. Attached as Exhibit G is a true and correct copy of an article titled "Expert Witness Disclosures: How to Comply and Avoid Exclusion," authored by Courtland C.

Merrill on April 8, 2008 (retrieved from <http://mnbenchbar.com/2008/04/expert-witness-disclosures/> on February 18, 2016).

9. I certify pursuant to Minnesota Local Rule 7.1 that counsel for Defendants have met and conferred with counsel for Luminara, but have been unable to resolve any of the issues raised in the present motion.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 1st day of April, 2016, at San Diego, California.

/s/ Joseph P. Reid
Name